

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

DAVID MIDDENDORF, et al.,

Defendants.

**NOTICE OF MOTION**

18 Cr. 36 (JPO)

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Nola B. Heller, the exhibits attached thereto, and the accompanying Memorandum of Law, defendant THOMAS WHITTLE, by and through his attorneys, Cahill Gordon & Reindel LLP, will move this Court before the Honorable J. Paul Oetken, United States District Judge, at the United States Courthouse, 40 Foley Square, New York, New York 10007, at a time and date to be set by the Court for an Order:

1. Compelling the government to particularize and produce information in its possession in order to comply with its disclosure obligations under *Brady v. Maryland*, 373 U.S. 83 (1963), and its progeny; and
2. For such other relief as the Court may deem just and proper, including relief granted on the basis of motions filed by other defendants in this case.

Dated: June 8, 2018  
New York, New York

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bondi", written over a horizontal line.

Bradley J. Bondi  
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